

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

WALKME LTD.,

Plaintiff,

v.

WHATFIX INC.,

Defendant.

C.A. No. 23-227-MN

**STIPULATION AND JOINT MOTION REGARDING STAY AND
[PROPOSED] ORDER**

WHEREAS, this matter is currently stayed pending resolution of *inter partes* review pursuant to D.I. 52;

WHEREAS, the Court ordered that Plaintiff WalkMe Ltd. (“Plaintiff” or “WalkMe”) and Defendant Whatfix, Inc. (“Defendant” or “Whatfix”) (collectively the “Parties”) should advise the Court on or before April 18, 2025, as to whether either party would request that the stay be continued (*see* D.I. 56);

WHEREAS, the Parties anticipate dismissal of this action by April 29, 2025;

IT IS HEREBY STIPULATED AND AGREED by the Parties, through their undersigned counsel and subject to the approval of the Court, and the parties jointly move, that the Court extend the existing stay of this action through at least April 29, 2025.

In support of this Joint Motion, the Parties state as follows:

1. The Parties anticipate dismissal of this action on or before April 29, 2025.
2. To avoid additional expenditure of party and Court resources that might otherwise be incurred if the existing stay were to be lifted, the Parties have agreed and respectfully request that the Court continue the current stay of all proceedings.
3. Accordingly, the Parties jointly request that the Court stay all deadlines in this case until at least April 29, 2025.

WHEREFORE, the Parties respectfully move the Court to extend the stay of all deadlines in this case, including the parties' deadline pursuant to the Stipulation and Order to Stay Pending IPR Resolution (D.I. 52) to either file a motion to continue the stay or to jointly submit an updated proposed schedule to the Court, until at least April 29, 2025, and for such other and further relief as the Court deems just.

Dated: April 17, 2025

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Attorneys for Defendant Whatfix Inc.

SO ORDERED this ____ day of _____, 2025.

The Honorable Maryellen Noreika
United States District Judge